

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 21-cv-10928

v.

Honorable Denise Page Hood

\$3,840,772.58 U.S. dollars constituting  
125 international wire transfers seized  
From U.S. correspondent bank, Citibank,  
between December 21, 2020 and  
January 4, 2021,

\$1,025,446.18 U.S. dollars constituting  
42 international wire transfers seized  
from U.S. correspondent bank, JPMorgan  
Chase Bank, between December 21, 2020  
and January 4, 2021,

\$765,143.73 U.S. dollars constituting  
40 international wire transfers seized  
from U.S. correspondent bank, Bank of  
New York Mellon, between December 21,  
2020 and January 4, 2021,

\$145,466.52 U.S. dollars constituting  
6 international wire transfers seized  
from U.S. correspondent bank, Mashreq  
Bank PSC, between December 21, 2020  
and January 4, 2021,

\$387,337.51 U.S. dollars constituting  
13 international wire transfers seized  
from U.S. correspondent bank, Standard  
Chartered Bank, between December 21,  
2020 And January 4, 2021,

\$159,616.77 U.S. dollars constituting  
6 international wire transfers seized  
from U.S. correspondent bank, Deutsche  
Bank Trust Company Americas, between  
December 21, 2020 and January 4, 2021,

\$2,288,936.63 U.S. dollars constituting  
67 wire transfers seized from U.S.  
correspondent bank, Citibank, N.A.,  
between May 3, 2021 and May 21, 2021,

\$1,449,112.82 U.S. dollars constituting  
44 wire transfers seized from U.S.  
correspondent bank, JPMorgan Chase Bank,  
between May 3, 2021 and May 21, 2021,

\$1,348,713 U.S. dollars constituting  
44 wire transfers seized from U.S.  
correspondent bank, Bank of America,  
between May 3, 2021 and May 21, 2021,

\$636,373.90 U.S. dollars constituting  
28 wire transfers seized from U.S.  
correspondent bank, Bank of New York  
Mellon between May 3, 2021 and May 21,  
2021,

\$20,155 U.S. dollars constituting  
2 wire transfers seized from U.S.  
correspondent bank, Deutsche Bank  
and Trust Company Americas; between  
May 3, 2021 and May 21, 2021, and

\$34,000 U.S. dollars constituting  
2 wire transfers seized from U.S.  
correspondent bank, Mashreq Bank PSC,  
between May 3, 2021 and May 21, 2021,

Defendants,

NASA MOTORS FZE

Claimant.

**VERIFIED CLAIM**

Claimant Nasa Motors FZE, by and through Undersigned Counsel, hereby files this Verified Claim pursuant to 18 U.S.C. § 938(a)(4)(A) and Rules G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and hereby states the following:

1. The identities of the specific properties being claimed are the funds associated with the following wire transactions, as identified in the Second Amended Complaint for Forfeiture in the above-styled case:

Wire No.	Wire Date	Wire Amount
130	1/4/2021	\$14,895.00
131	1/4/2021	\$22,937.00
132	1/4/2021	\$46,584.00
133	1/4/2021	\$49,170.00
134	12/31/2020	\$5,910.00
135	12/31/2020	\$6,875.00
136	12/31/2020	\$9,920.00
137	12/31/2020	\$17,334.78
138	12/31/2020	\$46,920.00
139	12/31/2020	\$54,080.00
140	12/30/2020	\$43,672.00
141	12/30/2020	\$49,849.00
142	12/29/2020	\$19,674.00
143	12/29/2020	\$19,920.00

144	12/29/2020	\$49,920.00
145	12/28/2020	\$21,500.00
146	12/28/2020	\$31,420.00
147	12/28/2020	\$46,873.00
148	12/24/2020	\$7,075.00
149	12/24/2020	\$19,920.00
150	12/24/2020	\$22,960.00
151	12/24/2020	\$24,920.00
152	12/24/2020	\$26,920.00
153	12/24/2020	\$29,420.00
154	12/24/2020	\$47,671.00
155	12/24/2020	\$49,420.00
156	12/24/2020	\$49,905.00
157	12/23/2020	\$4,370.00
158	12/23/2020	\$39,325.00
159	12/22/2020	\$31,387.00
160	12/22/2020	\$49,405.00
161	12/21/2020	\$49,205.00
310	5/21/2021	\$9,000.00

2. The identity of Claimant is Nasa Motors FZE (“Claimant Nasa Motors”).

Claimant Nasa Motors is a foreign company established under the laws of the country of the

United Arab Emirates with its primary office located at Showroom no 218 Ducamz Ras al khor Dubai.

3. Claimant Nasa Motors has a valid and legal interest in all of the seized properties listed in Paragraph 1 of this Verified Claim as Claimant Nasa Motors is the corporate owner of all of the seized properties.

4. Mohd Zeeshan Alvi is the sole owner of Claimant Nasa Motors.

5. Claimant Nasa Motors acquired the properties listed in Paragraph 1 of this Verified Claim through lawful and legitimate means.

This 8 day of February, 2022

/s/Rebecca L. Castaneda  
Rebecca L. Castaneda  
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**VERIFICATION**

Pursuant to 28 U.S.C. § 1746, Mohd Zeeshan Alvi, owner of Claimant Nasa Motors, hereby declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 8 day of February, 2022.



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Mohd Zeeshan Alvi  
Owner of Nasa Motors FZE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Verified Claim has been electronically filed on February 8 2022, with the Clerk of the Court using the CM/ECF system which will automatically transmit an electronic filing to all parties of record.

/s/Rebecca L. Castaneda  
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